Exhibit 191

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR
MDL No. 3047
In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

August 17, 2021

Senator Richard Blumenthal
706 Hart Senate Office Building
Washington, DC 20510

Senator Marsha Blackburn
357 Dirksen Senate Office Building
Washington, DC 20510

Dear Senators Blumenthal and Blackburn,

Thank you for your August 4 letter. At Facebook, we take the issue of safety and well-being on our platforms very seriously, especially for the youngest people who use our services. As per our terms, we require people to be at least 13 years old to sign up for Facebook and Instagram. We are committed to working with parents and families, as well as experts in child development, online safety, and children's health and media, to ensure we are building better products for families. That means building tools that promote meaningful interactions and helping people manage their time on our platform. It also means giving parents the information, resources, and tools they need to help their children develop healthy and safe online habits. And it means continued research in this area.

We appreciate your leadership and the opportunity to continue to engage with you on these important issues. With this in mind, please find the answers to your specific questions below.

1. **Has Facebook conducted research on the effect of its platforms and products on children's and teens' mental health and well-being, as you told a House Subcommittee this March? Please describe the nature of this research.**

We work with clinical and social psychologists, social scientists, and sociologists, and we collaborate with top scholars to navigate various complex issues, including those related to well-being for users on Facebook and Instagram. Facebook also awards grants to external researchers in order to help us better understand how experiences on Facebook and Instagram relate to the safety and health of our community, including teen communities. And because mental health and well-being isn't just a Facebook issue, but a societal issue, Facebook works with experts in the field to look at the impact of mobile technology and social media more broadly on kids and teens, and how to better support them as they transition through different stages of life.

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We are committed to learning even more about these important issues, and we welcome the opportunity to work together with Congress and others in the industry to develop industry-wide standards. For example, Facebook and The Aspen Institute have collaborated to advance the collective understanding of loneliness, social connection, technology and how they all intersect. This effort has connected more than 60 cross-sector experts—from academia, health, technology, nonprofits, and government—to share research and identify gaps to inform future research and potential solutions. Earlier this year, we also supported the launch of the Digital Wellness Lab at Boston Children's Hospital, a first-of-its-kind research and innovation incubator bringing together science-based solutions and information about the effects of digital technology on our brains, bodies, and behaviors.

Additionally, we supported the bipartisan, bicameral Children and Media Research Advancement (CAMRA) Act, which would have provided funding for the National Institutes of Health to study the impact of technology and media on the cognitive, physical, and socio-emotional development of children and adolescents. And we appreciated the opportunity to participate in the bipartisan roundtable hosted by Senator Markey with Senator Blunt on this topic in February 2019.

Finally, we continue to engage with multiple industry experts to provide us with feedback on the development of new products and policies for young people. We meet regularly with our Youth Advisors, which include the Family Online Safety Institute, Media Smarts, Project Rockit, and the Cyberbullying Research Center, who also share their latest research findings and trends from their own work. We recently expanded this group to add new experts in privacy, youth development, psychology, parenting, and youth media, and we will continue expanding it to include a diverse range of global perspectives. Through this collaboration, we aim to build better experiences and products for families.

2. **Has Facebook's research ever found that its platforms and products can have a negative effect on children's and teens' mental health or well-being, such as increased suicidal thoughts, heightened anxiety, unhealthy usage patterns, negative self-image, or other indications of lower well-being?**

Facebook was built to bring people closer together and build relationships. We design our services to be useful. And we want the time people spend on Facebook and Instagram to be intentional, positive, and inspiring. The effects of social media are still being studied, and as described in this letter, we work in collaboration with leading experts to better understand issues around mental health and well-being, and to make product decisions that enable meaningful social interactions.

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There are many challenges with conducting research in this space, and we are not aware of a consensus among studies or experts about how much screen time is "too much." Many experts and research studies suggest it's not necessarily about how much time you spend on social media, but more about what you're doing and the experiences you're having that's important. For example, although some research shows that passive use of social media—browsing and clicking links, but not interacting with people—can be linked with negative outcomes, research also shows that meaningful use of social media—sharing messages, posts, and comments—can be linked with positive outcomes, like feeling less lonely and more socially supported. This understanding has led to product changes to facilitate active interactions and meaningful connections between people as well as new features that give people more control over their experience on our services.

For example, we've developed and implemented tools to help people manage their time on Facebook and Instagram: an activity dashboard, a daily reminder, ways to limit notifications, and a "You're All Caught Up" message in people's Instagram feed. We've also given people the option to hide like counts on all posts in their Facebook and Instagram feeds and to hide like counts on their own posts, so others can't see how many likes their posts get. This way, people can focus on the photos and videos being shared, instead of how many likes a post gets.

Further, we recently made it easier to sort and browse News Feed, giving people more control over what they see. We also launched Favorites, a new tool where people can control and prioritize posts from the friends and Pages they care about most in their News Feed. Specifically, people can select up to 30 friends and Pages to include in Favorites, and posts from these selections will appear higher in ranked News Feed and can also be viewed as a separate filter. And on Instagram, people can make a close friends list on Stories and share with just the people they've added. We developed these tools based on collaboration and inspiration from leading mental health experts and organizations, academics, internal experts, and feedback from our community. Our hope is that these tools give people more control over the time they spend on our platforms.

Additionally, we've introduced initiatives to support people who report that they are struggling. For example, on Instagram we recently introduced resources for people who indicate being affected by negative body image or an eating disorder, including surfacing more expert-backed resources when people search for eating disorder-related content, expanding our work with experts to help inform our policies, and collaborating with community leaders to help them create and share positive, inspiring body image content. On Facebook, we have an Emotional Health Resource Center that includes mental health information and external expert developed resources addressing topics including stress, anxiety,

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depression, emotional crisis, grief, and loss. It also includes access to external suicide and self-harm prevention hotlines around the world, including hotlines specifically for youth.

When it comes to Facebook's youngest users, our efforts also include giving parents the information, resources, and tools they need to set parameters for their children's use of online technologies and to help them develop healthy and safe online habits. For example, as part of our Safety Center, we have a Parent Portal (https://www.facebook.com/safety/parents) and a Youth Portal (https://www.facebook.com/safety/youth), both of which are focused on fostering conversations around online safety, security, and well-being. We also have a Parent's Guide on Instagram (https://about.instagram.com/community/parents). We provide these tools to help parents and young people access information and resources they need to make informed decisions about their use of online technologies.

In 2020, we also launched Get Digital, our free digital literacy program, developed with experts, for teachers, students, and parents. It includes lesson plans, conversation starters, activities, videos, and other tools to help young people develop skills needed to navigate and thrive in today's digital world. For educators, Get Digital provides ready-to-use lessons for teaching young people about digital citizenship and maintaining health and well-being while using technology. For students, there are various activities that reinforce and expand on the digital skills they're learning in school and at home. And parents and caregivers can use this program to start conversations with kids about how to stay safe online. We remain dedicated to examining our own practices and the resources we make available for the safety and security of people who use our services.

3. **Has Facebook ever developed or maintained a platform or product features (such as user interface designs, ad targeting options, social engagement options, or content selection algorithms) that it had reason to believe could have a negative effect on children's and teens' mental health or well-being?**

Our goal is to build technology that fosters meaningful interactions and relationships, especially for our younger users. Teaching kids how to use technology in a positive, healthy way will bring better experiences later as they grow. As discussed above, youth safety and well-being are priorities, and we work hard to put the right policies, products, and precautions in place.

For example, we have built many special protections for teens. This includes protections like preventing adults from messaging Facebook and Instagram users under the age of 18 unless the user follows that adult, displaying

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warning notices if young users receive a suspicious message from someone, and offering education for young users about why they should, and how they can, protect their privacy online. Moreover, we recently announced that we will be defaulting young people between the ages of 13 and 16 to private accounts on Instagram. Previously, we asked young people to choose between a public account or a private account when they signed up for Instagram, but our recent research showed that they appreciate a more private experience. During testing, eight out of ten young people accepted the private default settings during sign-up.

We also recently announced changes to how advertisers can reach young people with ads. Starting in a few weeks, we'll only allow advertisers to target ads to people under 18 (or older in certain countries) based on their age, gender, and location. This means that previously available targeting options, like those based on interests or on their activity on other apps and websites, will no longer be available to advertisers. These changes will be global and apply to Instagram, Facebook, and Messenger.

Finally, as discussed in our response to Question 2, we give parents the information, resources, and tools they need to set parameters for their children's use of online technologies and to help them develop healthy and safe online habits. We also develop programs for educators to teach young people about digital citizenship and maintaining their health and well-being while using technology. We employ social psychologists, social scientists, and sociologists and regularly consult with top scholars and other experts to ensure that our policies properly account for the presence of young people on our platforms. This is complex territory, and we're committed to working with experts and the broader industry to give young people a compelling and safe experience on our services.

4. **Has Facebook ever found that child or teenage users engage in usage patterns that would indicate addictive or unhealthy usage of its platforms or products?**

    Please see our responses to Questions 2 and 3.

5. **Has Facebook ever taken steps to further increase the time that children and teenagers spend on its platforms, knowing that such steps could have harmful effects on young audiences?**

Facebook's mission is to bring communities closer together, and to that end, we work to optimize for meaningful social interaction rather than for attention and time. We build our systems so that people see the most meaningful content from their friends, family, and Groups. In fact, back in 2018, we announced a big

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shift in this direction, even though we knew that as a result of the change, people would likely spend less time on Facebook. Notably, we changed the way we approached News Feed rankings to focus not only on serving people the most relevant content, but also on helping them have more meaningful social interactions—primarily by doing more to prioritize content from friends, family, and Groups they are part of.

We recognized that this shift would likely lead to people spending less time on Facebook, because Pages—where media entities, sports teams, politicians, and celebrities, among others, tend to have a presence—generally post more engaging (though less personally meaningful) content than a user's personal friends or family. The prediction proved correct; the change led to a decrease of 50 million hours' worth of time spent on Facebook per day, and we saw a loss of billions of dollars in the company's market cap. But we view this change as a success because it improved people's experience, and we think building good experiences is good for our business in the long term.

For additional information responsive to this request, please see our responses to Questions 2 and 3.

6. **Will Facebook commit to release the results of its internal research on the effect its platforms and products have on children and teen's mental health and well-being?**

As discussed above, in an effort to help move our understanding forward and build better tools and services, we work with world-class social scientists to conduct research (many of whom have their PhDs and some of whom are youth specialists), and we also collaborate with and fund research by leading experts. The research we do is designed to help create platforms that are safe and useful so we can provide better experiences for our community. As a general matter, this work is proprietary and involves various technical teams within the company. It is also kept confidential in order to promote frank and open dialogue and brainstorming internally. However, we would be happy to meet with you to discuss our learnings and the steps we are taking in this important area in greater detail.

Thank you, again, for the opportunity to answer your questions. I look forward to working with you and your offices going forward.

Sincerely,

FACEBOOK, Inc.

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